



August 3, 2018

Via ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington DC 20554

**Re: Panhandle Telecommunication Systems, Inc.
E911 Location Accuracy Progress Report
PS Docket No. 07-114**

Womble Bond Dickinson (US) LLP

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Dear Ms. Dortch:

Pursuant to 47 C.F. R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of Panhandle Telecommunication Systems, Inc., is its E911 location accuracy progress report.

Should you have any questions, please contact undersigned counsel.

Best regards,

Womble Bond Dickinson (US) LLP

/s/ Michael R. Bennet

Michael R. Bennet
Partner

Attachment

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

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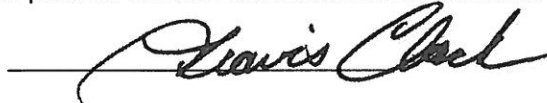
Wireless E911 Location Accuracy Requirements) PS Docket No. 07-114

Panhandle Telecommunication Systems, Inc. E911 Location Accuracy 36 Month Progress Report

Panhandle Telecommunication Systems, Inc. ("Panhandle"), pursuant to Section 20.18(i)(4)(ii) of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its 36 month progress report.

Panhandle is a small non-nationwide CMRS carrier providing service in Oklahoma. Panhandle does not provide service in any of the top 50 CMAs. Panhandle entered into a services agreement with West Safety Services ("West") for infrastructure, software and services to enable Panhandle to provide enhanced 911 ("E911") location data to E911-capable public safety answering points ("PSAPs"). Panhandle has utilized the Location Performance Management ("LPM") tool provided by West to ensure compliance with location accuracy requirement of Section 20.18(i)(2)(i)(B)(2) of the FCC's rules. The LPM allows users to optimize network accuracy and identify areas for improvement. Its performance monitoring and reporting tools identify location performance issues and provide reports that allow for auditing key performance indicators and call results and analyze location server performance. The LPM provides live call data reports, 50 meter accuracy reports, and PSAP reports consistent with ATIS's 05000031 recommendation.

In Texas County, Oklahoma, the only county served by Panhandle where the PSAP has requested and is capable of receiving and utilizing Phase I and Phase II E911 data, Panhandle exceeds the current 50% location accuracy benchmark. To the extent it deploys a commercially operating VoLTE platform in its network, and is therefore required to meet the subsequent 70% and 80% accuracy benchmarks, Panhandle, through use of the LPM tool, plans on taking whatever additional steps are necessary to achieve the required degree of accuracy. Panhandle will make available to PSAPs uncompensated barometric pressure data for any 911 call placed from any handset offered by Panhandle that has the capability to deliver barometric sensor data. Because Panhandle does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.



Travis Clark, Plant Manager

Date: August 2, 2018